

United States District Court
Eastern District of New York

Oscar Cruz, Mynor Polanco and Carlos Vasquez,
individually and on behalf of all others similarly situated,

Plaintiff(s),

-against-

Demarco Bros Landscaping & Tree Service Corp d/b/a
Frank Giovinazzo Tree Service d/b/a Frank Giovinazzo
North Shore Tree Service d/b/a North Shore Tree
Service, and Theodore Passelis,

Defendant(s).

)
) **Case No. 2:23-cv-9200**
) **(GRB)(ARL)**

) **[PROPOSED] SO-**
) **ORDERED STIPULATION**
) **REGARDING FLSA**
) **COVERAGE**

IT IS HEREBY stipulated and agreed, by an between counsel for all represented parties that Demarco Bros Landscaping & Tree Service Corp. Demarco Bros Landscaping & Tree Service Corp d/b/a Frank Giovinazzo Tree Service d/b/a Frank Giovinazzo North Shore Tree Service d/b/a North Shore Tree Service (the “corporate defendant”) was an enterprise engaged in commerce that had annual gross sales of at least \$500,000.00 during the three year period preceding the filing of the complaint in this action.

Dated: April 4, 2025

MOSER LAW FIRM, P.C.

/s/ Steven John Moser
By: Steven John Moser
133 C New York Avenue
Huntington, New York 11743
steven.moser@moserlawfirm.com
(516) 671-1150

Attorneys for Plaintiff(s)

Dated: April 4, 2025

LAW OFFICES OF MICHAEL GIAMPILIS

/s/ Michael Giampilis
By: Michael Giampilis
2 Supreme Ct
Smithtown, NY 11787
mgiampilis@giampilislaw.com
(516) 739-5838

Attorneys for Defendant(s)

SO ORDERED: